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May 15, 2014

Hon. Laura Taylor Swain
United States District Court
Daniel Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

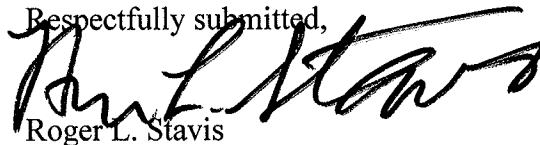
Re: Universitas Education, LLC v. Nova Group, Inc.
Docket No. 11-CV-1590 (LTS)(HBP)

Dear Judge Swain:

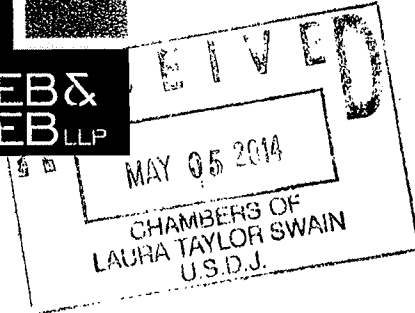
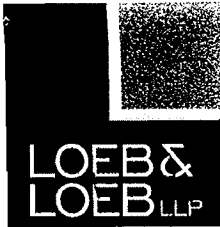
This firm represents Nova Group, Inc. before the Second Circuit on appeal of that portion of this Court's Rule 11 Sanction order requiring Nova to deposit a sum in excess of \$30 Million with the Clerk of the Court. Yesterday we received an ECF notification of a "memo endorsed" order signed on May 13th with regard to Universitas Education's settlement with a separate party, Jack E. Robinson. A copy of the letter is enclosed herein. The letter by Loeb & Loeb, LLP attorney Michael Barnett, Esq., on which this Court affixed its memo endorsement, stated: "If the Motions are granted, Nova Group, Inc.'s appeal as part of the Rule 11 sanction (see Dkt. No. 318) will likely be dismissed on consent." Letter of Michael Barnett 5/2/14 at p. 1.

The purpose of this letter is to advise the Court that Mr. Barnett has never spoken with us about our consent to dismiss the appeal. Had he done so before assuming our consent in a letter to this Court, we would have informed him that we would not consent. The order to Nova to deposit \$30 Million is unaffected by the Universitas settlement with Jack E. Robinson. We would also note that Universitas' settlement with Mr. Robinson, renders his pending Motion for Reconsideration (Docket 301) moot.

Respectfully submitted,



Roger L. Stavis
Gallet, Dreyer & Berkey
Appellate Counsel for Nova Group, Inc.

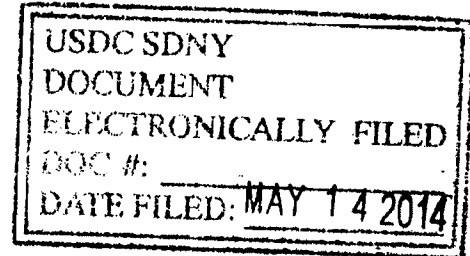


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Via ECF
Via Messenger



May 2, 2014

The Hon. Laura Taylor Swain
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Universitas Education, LLC v. Nova Group, Inc.*, Case No. 11-1590-LTS-HBP

Dear Judge Swain:

We represent Universitas Education, LLC ("Universitas"), and write with the consent of Jack E. Robinson and in regards to Mr. Robinson's Motions for Reconsideration of certain sanctions decisions (Dkt. Nos. 301-302 and 390-391).

Universitas has reached a confidential settlement agreement with Mr. Robinson, and pursuant to that agreement, Universitas has discharged any debt that Mr. Robinson may have owed to Universitas as a result of this Court's sanctions and contempt orders.

Further, Universitas now consents to and requests that the Court grant Mr. Robinson's Motions for Reconsideration and deny, as moot, Universitas's application for attorneys' fees with respect to Mr. Robinson (Dkt. Nos. 314-315). Universitas's joining in the Motions for Reconsideration does not change its view of whether Mr. Robinson's conduct was sanctionable; rather, Universitas joins in the Motions because Mr. Robinson has acted in good faith in reaching the settlement and shown an overall willingness to amicably resolve disputes. In view of the settlement, we now believe the Court's granting of the Motions for Reconsideration serves the interests of Universitas and Robinson, as well as the efficiency/economy interests of the Court. (If the Motions are granted, Nova Group, Inc.'s appeal of a part of the Rule 11 sanction (see Dkt. No. 318) will likely be dismissed on consent.)

Please note that nothing in the settlement agreement is contingent upon the Court's granting the Motions for Reconsideration. We understand that it is up to the Court to decide whether to grant or deny the Motions. We appreciate the Court's attention to this matter.



The Hon. Laura Taylor Swain
May 2, 2014
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Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Michael Barnett'.

Michael Barnett
Loeb & Loeb LLP

cc: Jack E. Robinson (via ECF)

The foregoing requests are
granted. This endorsed order
resolves docket entries
314 and 315.

SO ORDERED:

A handwritten signature in cursive script, appearing to read 'Laura Taylor Swain', followed by the date '5/13/14' and a horizontal line.

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE